

MWG:RWN  
F. #2023R00969

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

JUSTIN DOVLATOV,  
Defendant.

COMPLAINT AND  
AFFIDAVIT IN SUPPORT  
OF AN APPLICATION FOR  
AN ARREST WARRANT

(18 U.S.C. § 1951(a))

Case No. 24 MJ 618

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EASTERN DISTRICT OF NEW YORK, SS:

MEGAN QUINN, being duly sworn, deposes and states that she is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), duly appointed according to law and acting as such.

On or about December 1, 2023, within the Eastern District of New York and elsewhere, the defendant JUSTIN DOVLATOV, together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency and merchandise from a smoke shop located on Fulton Street in Brooklyn, New York, the identity of which is known to me (“Smoke Shop-2”).

(Title 18, United States Code, Section 1951(a))

The source of your deponent's information and the grounds for her belief are as follows<sup>1</sup>:

1. I have been a Special Agent with the ATF for approximately 18 years, and was previously assigned to the Joint Robbery Task Force. I have been involved in the investigation of numerous robbery cases. I am familiar with the facts and circumstances set forth below from my participation in the investigation, as well as my review of the investigative file, surveillance videos, and reports of other law enforcement officers involved in the investigation.

2. The United States, including the ATF and the NYPD, has been investigating a pattern of robberies committed or facilitated by the defendant JUSTIN DOVLATOV and others, which took place in or about and between November 2023 and December 2023. In particular, and as described further below, DOVLATOV has robbed three smoke shops during the relevant time period, including the following:

a. On or about November 24, 2023, at approximately 8:42 p.m., DOVLATOV and one co-conspirator robbed a smoke shop located on Broadway in Brooklyn, New York, the identity of which is known to me ("Smoke Shop-1").

b. On or about December 1, 2023, at approximately 2:30 a.m., DOVLATOV and three co-conspirators robbed Smoke Shop-2.

c. On or about December 1, 2023, at approximately 8:00 p.m., DOVLATOV and one co-conspirator robbed a smoke shop located on Wyckoff Avenue in Brooklyn, New York, the identity of which is known to me ("Smoke Shop-3").

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<sup>1</sup> Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest, I have not set forth every fact learned during the course of this investigation.

I.     The Robbery of Smoke Shop-1

3.     On or about November 24, 2023, at approximately 8:42 p.m., two men wearing face masks robbed Smoke Shop-1 at gunpoint. One of the robbers was a black man wearing a camouflage-patterned face mask, black hooded jacket, dark-colored pants, and black sneakers with white tongues (“Co-Conspirator-1”). The other robber was a light-skinned man wearing a black face mask, dark-colored hooded sweatshirt with a white Nike logo and white decal on the chest, dark-colored pants, and grey sneakers. This individual was later identified as DOVLATOV, as described below.

4.     The robbery of Smoke Shop-1 was captured on surveillance video, which I have viewed. The available footage shows that DOVLATOV and Co-Conspirator-1 approached and entered the store. (See Figure 2 below). Once inside, Co-Conspirator-1 brandished a firearm to the store employee behind the counter, went behind the counter, and grabbed items of merchandise, while DOVLATOV stood at the front door in a manner consistent with serving as a lookout. The store employee then grabbed Co-Conspirator-1, and a physical struggle between DOVLATOV, the employee, and Co-Conspirator-1 ensued, during which DOVLATOV struck the employee with a chair. DOVLATOV and Co-Conspirator-1 then fled on foot.

5.     Video surveillance from a nearby camera depicts DOVLATOV and Co-Conspirator-1 fleeing the scene of the robbery and entering the interior of the Sumner Houses, a public housing apartment complex located approximately one block away from Smoke Shop-1.

6.     Shortly before the robbery of Smoke Shop-1, video surveillance from residential apartment buildings within the Sumner Houses depicts DOVLATOV walking with Co-Conspirator-1 inside of 987 Myrtle Avenue, Brooklyn, New York. (See Figure 1 below). As shown below, DOVLATOV appears to be wearing the same clothing that he wore during the above-described robbery.

7. Shortly after the robbery of Smoke Shop-1, video surveillance from the Sumner Houses depicts DOVLATOV return to 987 Myrtle Avenue (see Figure 3 below) and emerge shortly thereafter wearing a black bubble jacket (see Figure 4 below).

8. Still images from video surveillance depicting DOVLATOV before and after the robbery of Smoke Shop-1 are shown below. I believe the individual depicted to be DOVLATOV because I have compared the individual depicted in this video surveillance with other known photographs of DOVLATOV, including photographs of DOVLATOV obtained from a cell phone seized from DOVLATOV (as described below in paragraph 18), and I believe that they all depict the same person.



Figure 1  
987 Myrtle Ave.  
before the robbery



Figure 2  
Smoke Shop-1  
before the robbery



Figure 3  
987 Myrtle Ave.  
after the robbery



Figure 4  
987 Myrtle Ave.  
after the robbery

9. During the course of my investigation, I have obtained historical cell-site information for a mobile telephone used by DOVLATOV (the “DOVLATOV Number”) pursuant to a search warrant authorized by the Honorable Peggy Kuo, United States Magistrate

Judge, Eastern District of New York (the “Cell Site Warrant”). I believe that the DOVLATOV Number was used by DOVLATOV because, in November 2023, NYPD officers responded to a domestic incident involving DOVLATOV at 987 Myrtle Avenue, Brooklyn, New York (i.e., the same address described above), and the DOVLATOV Number was provided as JUSTIN DOVLATOV’s telephone number. In addition, the DOVLATOV Number is listed as the recovery phone number on a Google account with the name JUSTIN DOVLATOV, and T-Mobile records indicate that the subscriber address for the DOVLATOV Number is 987 Myrtle Avenue, which is the address where DOVLATOV was seen both before and after the above-described robbery.

10. Records provided by T-Mobile in response to the Cell Site Warrant show that on November 24, 2023, at 8:43 p.m., the DOVLATOV Number was located in the vicinity of Smoke Shop-1.

## II. The Robbery of Smoke Shop-2

11. On or about December 1, 2023, at approximately 2:30 a.m., four men wearing face masks robbed Smoke Shop-2 at gunpoint. One robber was a black man wearing a black face mask, black hooded jacket, dark-colored pants, and black sneakers with white tongues (Co-Conspirator-1). A second robber was a light-skinned man wearing a camouflage-patterned face mask, black bubble jacket, dark-colored pants, and black sneakers with purple tongues and red stripes at the bottom (later identified as DOVLATOV). A third robber was a black man wearing a dark-colored face mask, black jacket with a fur-lined hood and a tear in the right sleeve, grey sweatpants, and black sneakers (“Co-Conspirator-2”). The fourth robber was a heavyset black man wearing a black face mask, dark-colored hooded sweatshirt and vest, black sweatpants, and black-and- white sneakers (“Co-Conspirator-3”).

12. The robbery was captured on store surveillance cameras, which law enforcement has secured. Still images from video surveillance depicting the four perpetrators inside of Smoke Shop-2 are shown below in Figure 5:



Figure 5  
Smoke Shop-2  
before and during the robbery

13. The available footage shows that shortly before the robbery of Smoke Shop-2, DOVLATOV and Co-Conspirator-2 entered the store (see Figure 6 below), looked around, and then left on foot. Shortly afterward, Co-Conspirator-1, Co-Conspirator-2, and Co-Conspirator-3 approached the store on foot and entered, as a blue Hyundai Elantra was parked in front of the store. Once inside, Co-Conspirator-1 and Co-Conspirator-3 each brandished

firearms to the store employee behind the counter. Co-Conspirator-1 and Co-Conspirator-2 then climbed behind the counter and stole approximately \$600 of United States currency and approximately \$1,000 worth of merchandise, while Co-Conspirator-3 continued to brandish his firearm. Meanwhile, DOVLATOV emerged from the blue Hyundai Elantra and stood at the front door of the store, acting in a manner consistent with serving as a lookout.

14. After the robbery, Co-Conspirator-1, Co-Conspirator-2, Co-Conspirator-3, and DOVLATOV exited the store, entered the blue Hyundai Elantra, and fled the scene.

15. Approximately forty minutes after the robbery, video surveillance from the Sumner Houses depicts four males whose size, build, and clothing are consistent with DOVLATOV, Co-Conspirator-1, Co-Conspirator-2, and Co-Conspirator-3, returning to 987 Myrtle Avenue. (See Figure 8 below).

16. Still images from video surveillance depicting DOVLATOV before, during, and after the robbery of Smoke Shop-2 are shown below:



Figure 6  
Smoke Shop-2  
before the robbery

Figure 7  
Smoke Shop-2  
during the robbery

Figure 8  
987 Myrtle Ave.  
after the robbery

17. Records provided by T-Mobile in response to the Cell Site Warrant do not show the location of the DOVLATOV Number at or near the time of the above-described robbery of Smoke Shop-2. However, these records do show that on December 1, 2023, at approximately 3:51 a.m.—approximately one hour and 20 minutes after the robbery, and approximately 40 minutes after video surveillance depicts DOVLATOV and his co-conspirators returning to 987 Myrtle Avenue—the DOVLATOV Number was located in the vicinity of the Sumner Houses.

18. I have reviewed a partial forensic extraction of data from one white Apple iPhone that was recovered by the NYPD incident to an arrest of the defendant JUSTIN DOVLATOV on or about February 21, 2024 (the “DOVLATOV Phone”) for an unrelated incident. A search of the DOVLATOV Phone was conducted pursuant to a search warrant authorized by the Honorable Cheryl L. Pollak, United States Magistrate Judge, Eastern District of New York. I observed the DOVLATOV Phone to contain multiple photographs of an individual who appears to be DOVLATOV wearing clothing consistent with the clothing shown in Figures 5-8 above. An excerpt of one such photo, created on or about November 8, 2023, is shown below:



Figure 9  
DOVLATOV Phone  
November 8, 2023

19. I also observed the DOVLATOV Phone to contain multiple screenshots of a wanted flyer posted online by the NYPD in connection with the robbery of Smoke Shop-2, as shown below:

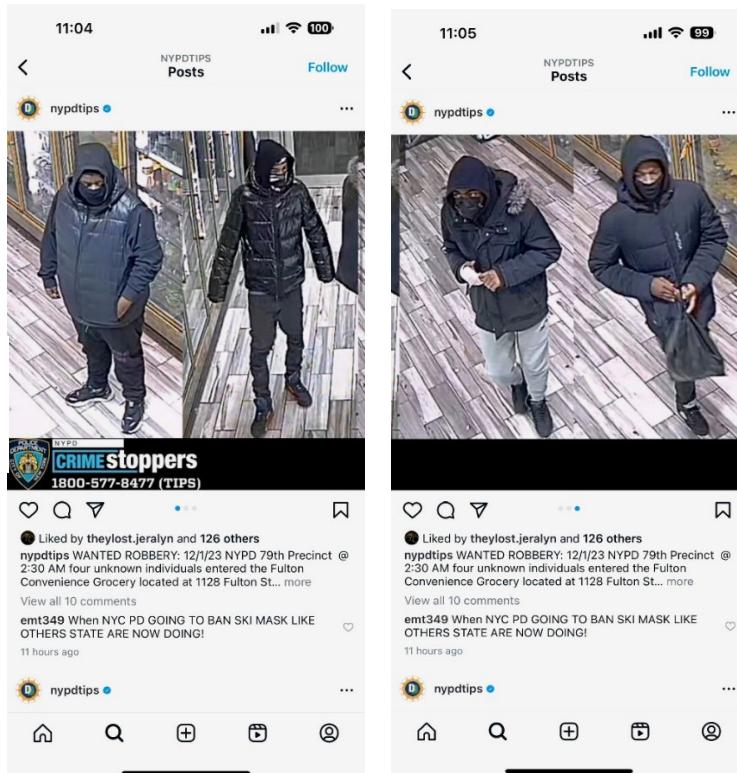


Figure 10  
DOVLATOV Phone  
December 14, 2023

Figure 11  
DOVLATOV Phone  
December 14, 2023

### III. The Robbery of Smoke Shop-3

20. On or about December 1, 2023, at approximately 8:00 p.m., two men wearing face masks robbed Smoke Shop-3 at gunpoint. One of the robbers was a light-skinned man wearing a dark-colored face mask, blue hooded sweatshirt, dark-colored pants, and black sneakers with purple tongues and red stripes at the bottom (later identified as DOVLATOV). The other robber was a black man wearing a dark-colored face mask, black jacket with a fur-lined hood and a tear in the right sleeve, black pants, and white sneakers (“Co-Conspirator-2”).

21. The robbery of Smoke Shop-3 was also captured on store surveillance cameras, which law enforcement has secured. The available footage shows that DOVLATOV and Co-Conspirator-2 approached Smoke Shop-3 on foot, entered, and approached the counter. (See Figure 13 below). DOVLATOV then brandished a firearm to the store employee behind the counter and climbed over the counter. DOVLATOV and Co-Conspirator-2 then stole approximately \$400 of United States currency, one black plastic bag containing store merchandise, and one green bag containing store merchandise. (See Figure 16 below). After the robbery, DOVLATOV and Co-Conspirator-2 exited the store and fled the scene.

22. Approximately one and a half hours after the robbery of Smoke Shop-3, video surveillance from the Sumner Houses depicts Co-Conspirator-2 and DOVLATOV inside of 888 Park Avenue, dividing up United States currency and holding a black plastic bag and green bag consistent with the two bags stolen during the robbery of Smoke Shop-3. (See Figures 14, 16 below). Co-Conspirator-2 appears to be wearing a purple sweatshirt, light-colored pants, and white sneakers, and DOVLATOV appears to be wearing a black balaclava, a camouflage-patterned shirt, dark-colored pants, and black sneakers with purple tongues and red stripes at the bottom.

23. Video surveillance then depicts Co-Conspirator-2 and DOVLATOV walk into 987 Myrtle Avenue. DOVLATOV is carrying a blue sweatshirt consistent with the sweatshirt shown on video surveillance during the robbery of Smoke Shop-3 (see Figure 15 below), and Co-Conspirator-2 is carrying a green bag consistent with the green bag stolen during the robbery (see Figure 18 below).

24. Still images from video surveillance depicting DOVLATOV before, during, and after the robbery of Smoke Shop-3 are shown below:

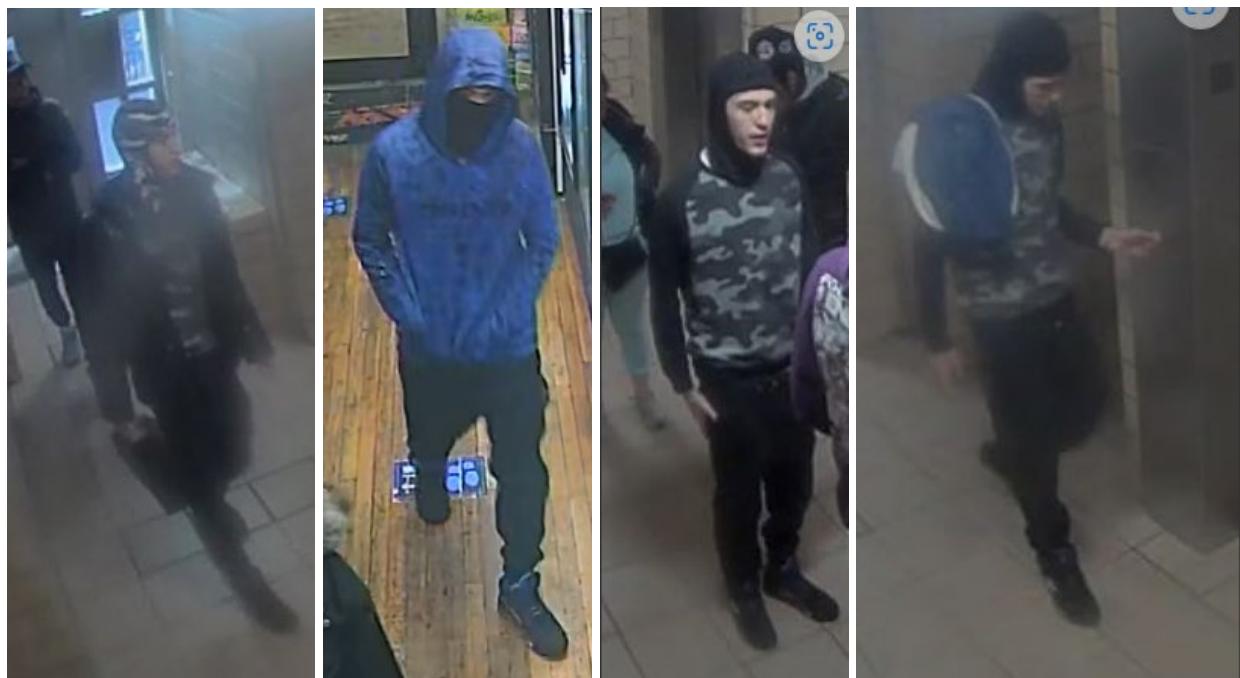


Figure 12  
987 Myrtle Ave.  
before the robbery

Figure 13  
Smoke Shop-3  
during the robbery

Figure 14  
888 Park Avenue  
after the robbery

Figure 15  
987 Myrtle Ave.  
after the robbery

27. DOVLATOV appears to be wearing the same black sneakers with purple tongues and red stripes at the bottom in Figures 12-15 as he wore during the robbery of Smoke Shop-2 and in images from the DOVLATOV Phone (see Figures 5-9, above).

28. In addition, still images from video surveillance depicting Co-Conspirator-2 holding what appears to be the same green bag during and after the robbery of Smoke Shop-3 are shown below:



Figure 16  
Smoke Shop-3  
during the robbery



Figure 17  
888 Park Ave.  
after the robbery



Figure 18  
987 Myrtle Ave.  
after the robbery

29. Records provided by T-Mobile in response to the Cell Site Warrant show that on December 1, 2023, at 8:06 p.m.—only a few minutes after the above-described robbery of Smoke Shop-3—the DOVLATOV Number was located approximately three blocks away from Smoke Shop-3. At approximately 8:19 p.m., the DOVLATOV Number was located in the vicinity of the Sumner Houses.

#### IV. Conclusion

30. Based on the foregoing facts, I submit that there is probable cause to believe that JUSTIN DOVLATOV was the perpetrator of three gunpoint robberies of smoke shops in Brooklyn in or about November and December 2023, including the robbery of Smoke Shop-2 on or about December 1, 2023.

WHEREFORE, I respectfully request that an arrest warrant be issued for the defendant JUSTIN DOVLATOV so that he may be dealt with according to law.

/s/ Megan Quinn

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MEGAN QUINN  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Sworn to before me by telephone this  
15th day of November, 2024

*Joseph A. Marutollo*

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THE HONORABLE JOSEPH A. MARUTOLLO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK